

**Marie-Ann Greenberg, MAG-1284**  
**Marie-Ann Greenberg, Standing Trustee**  
**30 TWO BRIDGES ROAD**  
**SUITE 330**  
**FAIRFIELD, NJ 07004-1550**  
**973-227-2840**  
**Chapter 13 Standing Trustee**

---

IN RE:  
EILEEN CRUZ

**UNITED STATES BANKRUPTCY COURT**  
**DISTRICT OF NEW JERSEY**

**Case No.: 25-16446VFP**

**HEARING DATE: 09/04/2025**

---

**TRUSTEE'S OBJECTION TO CONFIRMATION OF PLAN**

Marie-Ann Greenberg, the Chapter 13 Standing Trustee by way of objection to the Debtor's proposed plan respectfully objects as follows:

- The plan does not appear to be feasible pursuant to 11 U.S.C. Section 1325(a)(6), as the debtor will be unable to make payments under the plan and to comply with the plan.
- Specifically,
  - The plan fails to address any secured creditors other than auto leases. Part 6 line/row 1 makes no sense. Counsel indicated she may dispute liens however no motions or adversary proceedings are filed.
- The plan as currently filed fails to address all creditors listed on Schedules D, E and G. Until a modified plan is filed, correctly addressing these creditors, the Trustee cannot recommend confirmation and will seek denial of this plan.
- The Chapter 13 Plan as filed is utilizing parts 4b and 7 to strip/cram various secured creditors. A certificate of service should be docketed providing for proper service to the affected creditors pursuant to D.N.J. LBR 2002-1, 3015-1, 3015-2 and the District Court's decision in the matter of In re Jacobo 477 B.R. 533 (D.N.J. 2012). Unless proper service is effectuated 21 days prior to the scheduled confirmation hearing the case cannot be recommended for confirmation.
- Debtor has failed to provide proof of income.
  - Specifically,
  - Also, Schedule I must be amended to reflect new job starting in August.
  - The debtor has failed to provide proof of current income. A paystub from debtor's employer dated no later than two weeks prior to the 341 date must be submitted.
- Matrimonial counsel must be retained but must be disinterested and will be subject to fee application approval.
- The Trustee has reviewed last year's tax return and a substantial refund was received. The Trustee therefore requests that any refund above \$2,500.00 be turned over to the Trustee for the life of the plan.

WHEREFORE, Marie-Ann Greenberg, the Chapter 13 Standing Trustee prays that confirmation of the Debtor's Chapter 13 plan in its present form be denied.

Dated: July 30, 2025

By: /S/Marie-Ann Greenberg  
Marie-Ann Greenberg, Esquire  
Chapter 13 Standing Trustee